UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ILYAS ALI,

Petitioner,

- against -

DHS/ICE/DEPT. OF JUSTICE,

Respondent.

No. 19 Civ. 8645 (LGS)

**NOTICE OF MOTION** 

PLEASE TAKE NOTICE that, upon the accompanying Respondent's Memorandum of Law in Support of its Motion to Dismiss or to Transfer the Case to the Northern District of Alabama and the Declaration of Senior Detention and Deportation Officer Perry Zaner dated October 22, 2019, Respondent, by and through its attorney, Geoffrey S. Berman, United States Attorney for the Southern District of New York, will move this Court to dismiss the petition or, in the alternative, transfer the petition to the Northern District of Alabama under Rule 12(b)(3) of the Federal Rules of Civil Procedure.

Dated: New York, New York October 23, 2019

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney for the Southern District of New York

By: s/Joshua E. Kahane

JOSHUA E. KAHANE Assistant United States Attorney 86 Chambers Street, 3rd Floor New York, New York, 10007 Telephone: (212) 637-2699 Facsimile: (212) 637-2786

E-mail: joshua.kahane@usdoj.gov

cc: Ilyas Ali (via Certified Mail)